

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MV3 PARTNERS LLC,

Plaintiff,

v.

ROKU, INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§

Civil Action No.: 6:18-cv-308-ADA

JURY TRIAL DEMANDED

MV3'S STATEMENT OF CLAIMS

Pursuant to W.D. Tex. Local Rule CV-16(e)(2), Plaintiff MV3 Partners LLC ("MV3") submits the following statement of its claims to be used by the Court in conducting voir dire.

This is a case brought by the Plaintiff, MV3 Partners LLC, against the Defendant, Roku, Inc. for patent infringement. MV3 is the owner of U.S. Patent No. 8,863,223, which we will refer to throughout the case as “the 223 Patent”, titled “Mobile Set Top Box.” Jared Abbruzzese is the inventor of the ’223 Patent and an owner of MV3. The ’223 Patent claims inventions related to screen mirroring and screen casting, which allow people to stream media content, such as Netflix, YouTube, or Hulu Live, from their mobile devices to a TV screen or monitor.

Roku makes, licenses, and sells a variety of streaming media products, including Roku Ultra, Roku Express, Roku Express+, Roku Premiere, Roku Premiere+, Roku Streaming Stick, Roku Streaming Stick+, Roku Smart Soundbar, and Roku TVs. These Roku products which MV3 accuses of infringement have the ability to (1) screen mirror, which allows people to “mirror” content on the screen of their mobile device, such as a person’s mobile phone, tablet, or laptop, so it can be viewed on a TV screen or monitor, and (2) to screen cast, which allows people to “cast” content from applications running on the person’s mobile device to a TV screen or monitor. MV3 claims that Roku is infringing the claims of the ’223 Patent without MV3’s permission and without paying MV3 any compensation for using its patented technology. MV3 seeks monetary damages from Roku in an amount that is adequate to compensate MV3 for the use of its patent.

Dated: September 28, 2020

RESPECTFULLY SUBMITTED,

By: /s/J Mark Mann

J. Mark Mann (Texas Bar No. 12926150)

mark@themannfirm.com

G. Blake Thompson (Texas Bar No. 24042033)

blake@themannfirm.com

MANN | TINDEL | THOMPSON

300 W. Main Street

Henderson, Texas 75652

913 Franklin Ave., Suite 201

Waco, Texas 76701

Telephone: (903) 657-8540

Facsimile: (903) 657-6003

Andy Tindel (Texas Bar No. 20054500)

atindel@andytindel.com

MANN | TINDEL | THOMPSON

112 E. Line Street, Suite 304

Tyler, Texas 75702

Telephone: (903) 596-0900

Facsimile: (903) 596-0909

Craig D. Cherry (Texas Bar No. 24012419)

ccherry@haleyolson.com

HALEY & OLSON, P.C.

100 N. Ritchie Road, Suite 200

Waco, Texas 76712

Telephone: (254) 776-3336

Facsimile: (254) 776-6823

Jonathan K. Waldrop (CA Bar No. 297903)

(Admitted in this District)

jwaldrop@kasowitz.com

Darcy L. Jones (CA Bar No. 309474)

(Admitted in this District)

djones@kasowitz.com

Marcus A. Barber (CA Bar No. 307361)

(Admitted in this District)

mbarber@kasowitz.com

John W. Downing (CA Bar No. 252850)

(Admitted in this District)

jdowning@kasowitz.com

Heather S. Kim (CA Bar No. 277686)

(Admitted in this District)

hkim@kasowitz.com

Jack Shaw (CA Bar No. 309382)

(Admitted in this District)

jshaw@kasowitz.com

ThucMinh Nguyen (CA Bar No. 304382)

(Admitted *pro hac vice*)

tnguyen@kasowitz.com

KASOWITZ BENSON TORRES LLP

333 Twin Dolphin Drive, Suite 200

Redwood Shores, California 94065

Telephone: (650) 453-5170

Facsimile: (650) 453-5171

Paul G. Williams (GA Bar No. 764925)

(Admitted *pro hac vice*)

pwilliams@kasowitz.com

KASOWITZ BENSON TORRES LLP

1349 West Peachtree Street N.W., Suite 1500

Atlanta, Georgia 30309

Telephone: (404) 260-6080

Facsimile: (404) 260-6081

Attorneys for Plaintiff

MV3 PARTNERS LLC

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] — Document Filing System, to all counsel of record, on this 28th day of September, 2020.

/s/ J. Mark Mann

J. Mark Mann